

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

SEAGEN INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
DAIICHI SANKYO CO., LTD.,	)	CASE NO. 2:20-cv-00337-JRG
	)	
Defendant, and	)	
	)	
ASTRAZENECA PHARMACEUTICALS	)	
LP and ASTRAZENECA UK LTD.,	)	
	)	
Intervenor-Defendants.	)	

**JOINT NOTICE TO THE COURT REGARDING  
PROPOSED ORDER IN WHICH TO ADDRESS PRE-TRIAL MOTIONS, MOTIONS *IN*  
LIMINE, AND EXHIBIT OBJECTIONS**

Plaintiff Seagen Inc. and Defendants Daiichi Sankyo Company, Limited, AstraZeneca Pharmaceuticals LP and AstraZeneca UK Ltd. (collectively, the “Parties”) submit this joint notice regarding the parties’ proposed order in which to address exhibit objections.

Group #	Group Name	MIL #s OR Exhibits OR Motion	Plaintiff’s Arguing Attorney	Defendants’ Arguing Attorney
<b><u>Seagen’s Objections to Defendants’ Exhibits</u></b>				
1	Post-filing evidence for § 112 issues (Seagen’s MIL No. 1 – Seagen understands its objection to these documents has been overruled and will make its	DX-0054,DX-0055,DX-0056,DX-0063,DX-0068,DX-0069,DX-0072,DX-0073,DX-0074,DX-0075,DX-0076,DX-0077,DX-0080,DX-0081,DX-0082,DX-0083,DX-0084,DX-0085,DX-0089,DX-0090,DX-0091,DX-0092,DX-0093,DX-0094,DX-0095,DX-0097,DX-0098,DX-0099,DX-0100,DX-0101,DX-0102,DX-0103,DX-0104,DX-0128,DX-0129,DX-0132,DX-	Matthew Chivvis	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers, David Berl, Jessamyn Berniker, Kathryn Kayali

	record tomorrow)	0135,DX-0136,DX-0140,DX-0143,DX-0145,DX-0146,DX-0147,DX-0151,DX-0153,DX-0154,DX-0155,DX-0156,DX-0160,DX-0161,DX-0166,DX-0168,DX-0171,DX-0173,DX-0175,DX-0176,DX-0180,DX-0181,DX-0183,DX-0185,DX-0186,DX-0188,DX-0190,DX-0191,DX-0194,DX-0197,DX-0201,DX-0204,DX-0206,DX-0207,DX-0209,DX-0216,DX-0219,DX-0220,DX-0221,DX-0227,DX-0228,DX-0229,DX-0231,DX-0232,DX-0233,DX-0234,DX-0242,DX-0243,DX-0246,DX-0250,DX-0252,DX-0254,DX-0255,DX-0257,DX-0258,DX-0259,DX-0260,DX-0261,DX-0262,DX-0263,DX-0264,DX-0265,DX-0266,DX-0267,DX-0268,DX-0269,DX-0270,DX-0271,DX-0417,DX-0418,DX-0440,DX-0443,DX-0444,DX-0445,DX-0446,DX-0447,DX-0448,DX-0449,DX-0450,DX-0451,DX-0452,DX-0453,DX-0454,DX-0455,DX-0456,DX-0457,DX-0458,DX-0459,DX-0460,DX-0461,DX-0462,DX-0465,DX-0469,DX-0470,DX-0478,DX-0486,DX-0488,DX-0489,DX-0490,DX-0491,DX-0492,DX-0493,DX-0494,DX-0495,DX-0496,DX-0536,DX-0537,DX-0546,DX-0548,DX-0550,DX-0551,DX-0552,DX-0553,DX-0554,DX-0555,DX-0556,DX-0558,DX-0562,DX-0563,DX-0564,DX-0571,DX-0573,DX-0579,DX-0597,DX-0598,DX-0599,DX-0600,DX-0601,DX-0621,DX-0622,DX-0623,DX-0625,DX-0626,DX-0639,DX-0644,DX-0646,DX-0647,DX-0648,DX-0649,DX-0650,DX-0651,DX-0652,DX-0654,DX-0683,DX-		
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		0974,DX-0994,DX-0998,DX-0999,DX-1015,DX-1033,DX-1034,DX-1035,DX-1036,DX-1037,DX-1038,DX-1039,DX-1060,DX-1061,DX-1062,DX-1063,DX-1064,DX-1065,DX-1066,DX-1067,DX-1068,DX-1069,DX-1070,DX-1071,DX-1072,DX-1073,DX-1074,DX-1075,DX-1076,DX-1077,DX-1078,DX-1079,DX-1080,DX-1081,DX-1082,DX-1083,DX-1138,DX-1184,DX-1185,DX-1186,DX-1187,DX-1188,DX-1189,DX-1207		
2	Preclude AZ testimony beyond marketing of Enhertu (Seagen's MIL No. 2 – Seagen understands its objection to these documents has been overruled and will make its record tomorrow)	DX-0054,DX-0055,DX-0056,DX-0132,DX-0135,DX-0209,DX-0259,DX-0270,DX-0271,DX-0306,DX-0307,DX-0308,DX-0440,DX-0444,DX-0445,DX-0446,DX-0447,DX-0448,DX-0449,DX-0450,DX-0451,DX-0452,DX-0453,DX-0454,DX-0455,DX-0456,DX-0457,DX-0458,DX-0459,DX-0460,DX-0461,DX-0462,DX-0493,DX-0494,DX-0652,DX-1032,DX-1033,DX-1034,DX-1035,DX-1036,DX-1037,DX-1038,DX-1039,DX-1048,DX-1050,DX-1060,DX-1061,DX-1062,DX-1063,DX-1064,DX-1065,DX-1066,DX-1067,DX-1068,DX-1069,DX-1070,DX-1071,DX-1072,DX-1073,DX-1074,DX-1075,DX-1076,DX-1077,DX-1078,DX-1079,DX-1080,DX-1081,DX-1082,DX-1083,DX-1084,DX-1085,DX-1086,DX-1087,DX-1088,DX-1089,DX-1090,DX-1091,DX-1092,DX-1093,DX-1094,DX-1095,DX-1096,DX-1097,DX-1098,DX-1099,DX-1100,DX-1101,DX-1102,DX-1103,DX-1104,DX-1105,DX-1106,DX-1107,DX-1108,DX-1109,DX-1110,DX-	Matthew Chivvis	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers, David Berl, Jessamyn Berniker, Kathryn Kayali

		1111,DX-1112,DX-1113,DX-1114,DX-1115,DX-1116,DX-1117,DX-1118,DX-1119,DX-1120,DX-1121,DX-1122,DX-1123,DX-1124,DX-1125,DX-1126,DX-1127,DX-1128,DX-1129,DX-1130,DX-1131,DX-1132,DX-1133,DX-1134,DX-1135,DX-1136,DX-1137,DX-1138		
3	Prejudicial documents regarding Seagen's "greed"	DX-1179, DX-1181	Matthew Chivvis	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers, David Berl, Jessamyn Berniker, Kathryn Kayali
4	Pre-Naito, Sankyo documents	DX-0760-782, DX-0784-856, DX-0880, DX-0881, DX-0888-911, DX-0913, DX-0914, DX-0916, DX-0928, DX-0936, DX-0942-947, DX-0949-954, DX-0956, DX-0959, DX-0960, DX0982-985, DX1209-1216, DX1218, DX1236, DX-1238, DX1242-1246, DX-1281-1371	Matthew Chivvis	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers, David Berl, Jessamyn Berniker, Kathryn Kayali
5	Tukysa Pre-Launch	DX-0517	Jayson Cohen	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers, David Berl, Jessamyn Berniker, Kathryn Kayali
6	Seagen scientists' pre-suit knowledge of DS-8201	DX-0420,DX-0421,DX-0422,DX-0423,DX-0424,DX-0425,DX-0426,DX-0483,DX-0484,DX-0485,DX-0489,DX-0565,DX-0566,DX-0567,DX-0568,DX-0569,DX-0600, DX-0612,DX-0613,DX-0614,DX-0618,DX-0657,DX-0696,DX-0697,DX-0698, DX-0963, DX-0964,DX-0965,DX-0966, DX-0967, DX-0969, DX-0970, DX-0971,DX-0972,DX-	Matthew Chivvis	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers, David Berl, Jessamyn Berniker, Kathryn Kayali

		0973,DX-0975,DX-0976, DX-0977,DX-0978,		
7	Double Hearsay	DX-0401-0406, DX-0511, DX-0512, DX-0517, DX-0710, DX-0712	Jayson Cohen	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers, David Berl, Jessamyn Berniker, Kathryn Kayali
8	Expert Materials that are Not Evidence	DX-0065,DX-0717,DX-0995,DX-0996,DX-0997,DX-1000,DX-1001,DX-1002,DX-1003,DX-1004,DX-1005,DX-1006,DX-1007,DX-1008,DX-1009,DX-1010,DX-1025,DX-1026,DX-1027,DX-1028	Chris Han	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers, David Berl, Jessamyn Berniker, Kathryn Kayali
<b><u>Defendants' Objections to Plaintiff's Exhibits</u></b>				
9	Arbitration Documents	PX-0242, PX-1077, PX-1078, PX-1079, PX-1080, PX-1086, PX-1087, PX-1088	Matthew Chivvis	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers
10	Public Domain	PX-0082, PX-0083, PX-0175, PX-0178, PX-0179, PX-0180, PX-0181, PX-0185, PX-0186, PX-0187, PX-0188, PX-0193, PX-0194, PX-0195, PX-0199, PX-0200, PX-0203, PX-0208, PX-0209, PX-0210, PX-0211, PX-0212, PX-0214, PX-0215, PX-0216, PX-0217, PX-0218, PX-0219, PX-0220, PX-0221, PX-0222, PX-0223, PX-0224, PX-0227, PX-0228, PX-0229, PX-0230, PX-0231, PX-0232, PX-0233, PX-0234, PX-0235, PX-0236, PX-0237, PX-0238, PX-0239, PX-0240, PX-0250, PX-0251, PX-0260, PX-0261, PX-0592, PX-0593, PX-0594, PX-0606, PX-0608, PX-0609, PX-0619, PX-0622, PX-0631, PX-0637, PX-0638, PX-0640, PX-0643, PX-0644, PX-0645, PX-	Matthew Chivvis	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers

		0646, PX-0648, PX-0650, PX-0651, PX-0652, PX-0653, PX-0654, PX-0655, PX-0656, PX-0659, PX-0660, PX-0661, PX-0664, PX-0666, PX-0674, PX-0677, PX-0681, PX-0683, PX-0691, PX-0692, PX-0693, PX-0694, PX-0700, PX-0701, PX-0702, PX-0717, PX-0724, PX-0725, PX-0737, PX-0739, PX-0740, PX-0743, PX-0744, PX-0745, PX-0747, PX-0748, PX-0750, PX-0758, PX-0767, PX-0768, PX-0771, PX-0779, PX-0780, PX-0781, PX-0782, PX-0785, PX-0791, PX-0792, PX-0793, PX-0794, PX-0797, PX-0798, PX-0799, PX-0801, PX-0802, PX-0804, PX-0806, PX-0815, PX-0821, PX-0826, PX-0827, PX-0837, PX-0847, PX-0857, PX-0879, PX-0884, PX-0887, PX-0897, PX-0903, PX-0906, PX-0923, PX-0979, PX-0980, PX-1148, PX-1149, PX-1150		
11	DSC In-House ADC Documents Not Regarding the Accused Product	PX-0252, PX-0253, PX-0258, PX-0259, PX-0262, PX-0263, PX-0596, PX-0679, PX-0720, PX-0727, PX-0729, PX-0736, PX-0741, PX-0757, PX-0764, PX-0765, PX-0766, PX-0783, PX-0784, PX-0786, PX-0829, PX-0830, PX-0854, PX-0859, PX-0902	Matthew Chivvis	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers
12	Alleged Copying of Unclaimed Processes	PX-0054, PX-0083, PX-0178, PX-0179, PX-0180, PX-0181, PX-0182, PX-0185, PX-0186, PX-0187, PX-0188, PX-0193, PX-0194, PX-0195, PX-0199, PX-0200, PX-0208, PX-0209, PX-0210, PX-0211, PX-0212, PX-0214, PX-0215, PX-0216, PX-0217, PX-0218, PX-0219, PX-0220, PX-0221, PX-0222,	Chris Han, Matthew Chivvis	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers

		PX-0223, PX-0224, PX-0227, PX-0228, PX-0229, PX-0230, PX-0231, PX-0232, PX-0233, PX-0234, PX-0235, PX-0238, PX-0239, PX-0240, PX-0606, PX-0608, PX-0609, PX-0619, PX-0622, PX-0631, PX-0640, PX-0643, PX-0645, PX-0646, PX-0648, PX-0650, PX-0651, PX-0652, PX-0653, PX-0654, PX-0655, PX-0656, PX-0659, PX-0660, PX-0664, PX-0666, PX-0674, PX-0677, PX-0681, PX-0683, PX-0691, PX-0692, PX-0693, PX-0694, PX-0702, PX-0724, PX-0725, PX-0739, PX-0743, PX-0747, PX-0750, PX-0767, PX-0768, PX-0791, PX-0792, PX-0793, PX-0794, PX-0801, PX-0802, PX-0804, PX-0815, PX-0837		
13	Research and Communications Concerning DR5 ADCs	PX-0084, PX-0085, PX-0086, PX-0087, PX-0088, PX-0089, PX-0183, PX-0184, PX-0189, PX-0190, PX-0191, PX-0192, PX-0197, PX-0198, PX-0201, PX-0202, PX-0204, PX-0205, PX-0206, PX-0207, PX-0213, PX-0225, PX-0226, PX-0587, PX-0590, PX-0595, PX-0598, PX-0599, PX-0602, PX-0605, PX-0607, PX-0610, PX-0611, PX-0612, PX-0614, PX-0615, PX-0616, PX-0617, PX-0618, PX-0620, PX-0621, PX-0623, PX-0624, PX-0625, PX-0626, PX-0627, PX-0628, PX-0629, PX-0630, PX-0633, PX-0635, PX-0636, PX-0639, PX-0641, PX-0642, PX-0647, PX-0649, PX-0657, PX-0658, PX-0663, PX-0665, PX-0667, PX-0668, PX-0669, PX-0670, PX-0671,	Matthew Chivvis	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers



		PX-0672, PX-0673, PX-0682, PX-0684, PX-0685, PX-0687, PX-0688, PX-0689, PX-0690, PX-0696, PX-0697, PX-0703, PX-0704, PX-0706, PX-0707, PX-0708, PX-0709, PX-0710, PX-0711, PX-0712, PX-0713, PX-0714, PX-0715, PX-0716, PX-0718, PX-0719, PX-0726, PX-0728, PX-0730, PX-0738, PX-0749, PX-0751, PX-0752, PX-0753, PX-0754, PX-0755, PX-0756, PX-0759, PX-0761, PX-0762, PX-0763, PX-0770, PX-0773, PX-0774, PX-0775, PX-0787, PX-0788, PX-0789, PX-0790, PX-0795, PX-0803, PX-0811, PX-0813, PX-0814, PX-0819, PX-0822, PX-0824, PX-0840, PX-0841, PX-0844, PX-0845, PX-0846, PX-0849, PX-0851, PX-0853, PX-0981, PX-1162		
14	Defendants' 2019 Strategic Alliance Agreement	PX-0274, PX-0962, PX-1040, PX-1042, PX-1045, PX-1094	Bryan Wilson	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers, David Berl, Jessamyn Berniker, Kathryn Kayali
15	AZ Investor Documents	PX-1039, PX-1071, PX-1128, PX-1217, PX-1223, PX-1224, PX-1228, PX-1244	Jayson Cohen	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers, David Berl, Jessamyn Berniker, Kathryn Kayali
16	DSC Investor Documents	PX-0354, PX-0364, PX-0597, PX-0919, PX-0948, PX-0952, PX-1003, PX-1115, PX-1207, PX-1210, PX-1214, PX-1218, PX-1232, PX-1247, PX-1253, PX-1258, PX-1262, PX-1277, PX-1278, PX-1280	Jayson Cohen	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers

17	Seagen Investor Documents	PX-1179, PX-1180, PX-1182, PX-1183, PX-1184, PX-1185, PX-1187, PX-1188, PX-1195, PX-1197, PX-1198, PX-1199, PX-1200, PX-1204, PX-1205, PX-1209, PX-1211, PX-1216, PX-1219, PX-1221, PX-1226, PX-1230, PX-1238, PX-1242, PX-1259, PX-1261, PX-1272, PX-1276	Jayson Cohen	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers
18	Third-Party Authored External Documents	PX-0092, PX-0430, PX-0431, PX-0432, PX-0433, PX-0434, PX-0435, PX-0437, PX-0440, PX-0441, PX-0442, PX-0444, PX-0447, PX-0448, PX-0449, PX-0450, PX-0451, PX-0452, PX-0453, PX-0454, PX-0455, PX-0456, PX-0457, PX-0458, PX-0459, PX-0460, PX-0461, PX-0462, PX-0463, PX-0464, PX-0466, PX-0467, PX-0468, PX-0469, PX-0470, PX-0472, PX-0475, PX-0476, PX-0477, PX-0478, PX-0479, PX-0480, PX-0481, PX-0483, PX-0484, PX-0485, PX-0486, PX-0487, PX-0488, PX-0489, PX-0492, PX-0493, PX-0494, PX-0495, PX-0497, PX-0498, PX-0499, PX-0500, PX-0501, PX-0502, PX-0505, PX-0507, PX-0512, PX-0513, PX-0516, PX-0518, PX-0520, PX-0522, PX-0524, PX-0525, PX-0526, PX-0529, PX-0530, PX-0540, PX-0541, PX-0542, PX-0544, PX-0553, PX-0567, PX-0569, PX-0574, PX-0604, PX-0678, PX-0816, PX-0848, PX-0881, PX-0911, PX-0970, PX-1015, PX-1027, PX-1072, PX-1111, PX-1114, PX-1116, PX-1117, PX-1118, PX-1121, PX-1122, PX-1156, PX-1157, PX-1158, PX-1161, PX-1201, PX-1202, PX-1203, PX-1213, PX-1225, PX-1227, PX-1231, PX-1233, PX-1234, PX-1236, PX-1245, PX-1246, PX-	Chris Han	David Berl, Jessamyn Berniker, Kathryn Kayali

		1248, PX-1249, PX-1250, PX-1254, PX-1255, PX-1256, PX-1260, PX-1263, PX-1266, PX-1267, PX-1283, PX-1285, PX-1286		
19	Third-Party Collaboration Documents	PX-1176	Matthew Chivvis	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers
20	Third-Party Patents	PX-0471, PX-0482, PX-0543, PX-0776	Matthew Chivvis	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers
21	Seagen Patents Outside the '039 Patent Family	PX-0680	Matthew Chivvis	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers
22	Not Produced	PX-0557, PX-0597, PX-0678, PX-0776, PX-1122, PX-1156, PX-1157, PX-1158, PX-1159, PX-1160, PX-1161, PX-1179, PX-1183, PX-1192, PX-1202, PX-1207, PX-1214, PX-1217, PX-1220, PX-1223, PX-1224, PX-1228, PX-1229, PX-1238, PX-1244, PX-1245, PX-1251, PX-1259, PX-1261, PX-1264, PX-1266, PX-1267, PX-1272, PX-1275, PX-1280, PX-1281, PX-1282, PX-1283	Chris Han	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers
23	Defendants' Witnesses' Deposition Notes	PX-0352, PX-1154	Chris Han	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers
24	Fact Witness Profiles	PX-0347, PX-1104, PX-1127	Matthew Chivvis	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers
25	DSC Financial Reporting	PX-0390, PX-0391, PX-0392, PX-0393, PX-0394, PX-0406, PX-0407, PX-0408, PX-0416, PX-0417, PX-0420	Jayson Cohen	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers, David Berl, Jessamyn

				Berniker, Kathryn Kayali
26	DSC-Third Party Collaboration Documents	PX-0054, PX-0182, PX-0810, PX-0836, PX-0842, PX-0843, PX-0858, PX-0926, PX-0963, PX-0964, PX-0965, PX-0968, PX-0976	Jayson Cohen	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers, David Berl, Jessamyn Berniker, Kathryn Kayali
27	DSC In-House ADC Documents Beyond Just the Accused Product	PX-0842, PX-0843, PX-0858 PX-0976	Matthew Chivvis	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers
28	DSC Authored External Documents Beyond Just the Accused Product	PX-0157, PX-0158, PX-0159, PX-0160, PX-0161, PX-0255, PX-0256, PX-0257, PX-0385, PX-0862, PX-0863, PX-0864, PX-0876, PX-0885, PX-0886, PX-0890, PX-0892, PX-0893, PX-0895, PX-0898, PX-0905, PX-0913, PX-0914, PX-0918, PX-0929, PX-0935, PX-0938, PX-0950, PX-0960, PX-0966, PX-0967, PX-0971, PX-0973, PX-0974, PX-0975, PX-0978, PX-1007, PX-1008, PX-1014, PX-1167, PX-1229, PX-1271, PX-1281	Matthew Chivvis	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers
29	Seagen ADC Work For Products Not Falling Under the Claims of the '039 patent	PX-0020, PX-0021, PX-0023, PX-0076, PX-0146, PX-0151, PX-0517, PX-0521, PX-0523, PX-0527, PX-0546, PX-0554, PX-0560, PX-0562, PX-0564, PX-0566, PX-0568, PX-0571, PX-0573, PX-0575, PX-0576, PX-0584, PX-0586, PX-0591, PX-0603, PX-0613, PX-0632, PX-0695, PX-0698, PX-0705, PX-0772, PX-0800, PX-0812, PX-0817, PX-0818, PX-0820, PX-0825, PX-0835, PX-0850, PX-0896, PX-0899, PX-0936, PX-0955, PX-0958, PX-0961, PX-0977, PX-1025, PX-1070, PX-1165, PX-1166, PX-1168, PX-1169, PX-1170, PX-1171, PX-	Chris Han	Preston K. Ratliff II, Lucas L. Kressel, Jake Silvers, David Berl, Jessamyn Berniker, Kathryn Kayali

		1172, PX-1173, PX-1174, PX-1175, PX-1186, PX-1189, PX-1190, PX-1191, PX-1212, PX-1220 PX-1235		
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